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July 1, 2022

Hon. Loretta A. Preska
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Derek Jones*
Case No.: 21 Cr. 59 (LAP)

Dear Judge Preska,

I was assigned to represent Derek Jones in the above referenced matter. For the reasons stated herein, I respectfully request a modification of Mr. Jones' bail conditions so that he may take his children camping at state and national parks located in the Eastern District of California.

Under the conditions of his bond, Mr. Jones is permitted to travel to the Southern and Eastern District of New York, and within the Central District of California where he resides. Between July 5 and July 11, he would like to drive with his four children to state and national parks located within the Eastern District of California to go camping. The locations include Yosemite National Park, Sequoia National Park, Tahoe State Recreation Area, Marin County, Big Sur, and San Simeone State Park.

As a result, I respectfully request a modification of Mr. Jones' bail conditions so that he may travel within the Eastern District of California from July 5 to July 11 for the purpose of camping with his children on the above itinerary. If approved, Mr. Jones would provide a detailed itinerary to Pre-Trial Services and have his cellphone with him throughout the trip.

The Government and Pre-Trial Services have no objection to this request.

SO ORDERED.

Dated: July 1, 2022
New York, New York

A handwritten signature in black ink that reads "Loretta A. Preska".

LORETTA A. PRESKA

Senior United States District Judge

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Thank you for your consideration in this matter.

Respectfully submitted,

s/Louis V. Fasulo

Louis V. Fasulo

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